

Consultation on proposed amendments to the Unlicensed Fishing for Crabs and Lobsters Regulations (Northern Ireland) 2008

Summary of Responses and Way Forward



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Section 1. Introduction

Existing arrangements

- 1.1 The purpose of this consultation was to seek views on proposals to amend The Unlicensed Fishing for Crabs and Lobster Regulations (Northern Ireland) 2008 (the 2008 regulations). These regulations permitted individuals to fish for certain crab and lobster species in Northern Ireland waters without a commercial fishing licence, under specific conditions.
- 1.2 The 2008 Regulations allow unlicensed (recreational) fishing for edible (brown) crab, velvet crab, spider crab, green crab, and lobster. They were designed to restrict the scale of such activity to prevent commercial-scale exploitation under the guise of recreational fishing.
- 1.3 Recreational fishers are currently limited to the use of five pots and the catching of one lobster and five crabs per day.
- 1.4 The 2008 regulations were a first step in managing recreational and part-time fishing activity. They did not include a requirement for registration, pot tagging, or catch recording and reporting.

Fisheries Act 2020 and the Joint Fisheries Statement

- 1.5 The Fisheries Act 2020 (the Act) sets out eight fisheries objectives that provide the basis against which the fisheries policy authorities (the Secretary of State, Scottish Ministers, Welsh Ministers and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland) will manage their fisheries.

- 1.6 This JFS sets out the policies agreed jointly between the fisheries policy authorities on sea fisheries (catching and processing), recreational sea fishing, and aquaculture management for achieving, or contributing to the achievement of, the fisheries objectives.
- 1.7 These policies, together with the fisheries objectives, will be reflected by fisheries policy authorities in their own policy development. Individual fisheries policy authorities may also have existing devolved strategies and policy documents, which already reflect policies within the JFS, and therefore the fisheries objectives.
- 1.8 Recreational sea fishing is also a popular form of fishing in the UK and, like commercial fishing, provides important economic and social benefits.
- 1.9 The policy on recreational sea fishing is provided for in section 4.2.16 of the Joint Fisheries Statement.
- 1.10 This states that the fisheries policy authorities will continue to work together - where possible, practicable and appropriate - to ensure recreational sea fishing is environmentally, socially and economically sustainable, and therefore contributes to the achievement of the sustainability objective. We will aim, where possible, to take account of recreational sea fishing in wider fisheries management.

1.11 It adds that this will continue to be underpinned by encouraging data collection on catches, economic impact, and species-specific data across the recreational sea fishing sector, and ensuring recreational interests are part of relevant stakeholder engagement processes. In doing so, we will contribute to the ecosystem and scientific evidence objectives.

Section 2 - Timing and duration of consultation

- 2.1 On 1st October 2025, the Department of Agriculture, Environment and Rural Affairs (DAERA) opened a consultation on proposals to amend the Recreational Fishing for Crabs and Lobster regulations (Northern Ireland) 2008. The consultation ran for a total of 12 weeks and closed on 24th December 2025.
- 2.2 The consultation sought views on introduction of a registration process for recreational crab and lobster fishers, a pot tagging requirement and the submission of catch records.
- 2.3 This was published on the Department's website and hosted on NI Direct's Citizen Space, the government's online consultation platform. The link to the consultation was also shared on DAERA's social media account platform X, and reposted weekly to publicise it to a wider audience.
- 2.4 This paper summarises the responses received to the consultation and sets out the next steps DAERA plans to take following the consultation exercise.

Section 3. Summary of consultation proposals and questions

3.1 Registration requirement

All individuals fishing for crabs and lobsters without a commercial licence would be required to pre-register with DAERA.

Purpose:

- To quantify and establish a clear record of participant numbers in the recreational sector;
- To enable effective communication and compliance monitoring; and
- To support future policy development and stock management.

The consultation question asked

Do you support the introduction of a registration process for unlicensed fishers?

3.2 Pot tagging requirement

Unlicensed fishers would be issued with 5 uniquely numbered coloured tags, with 1 to be attached to each pot. The tags would distinguish pots from those used by commercial fishers.

Purpose:

- To control the number of pots deployed;
- To reduce the risk of gear conflict and ghost fishing; and
- To improve traceability and enforcement.

The consultation question asked

Do you support the proposed pot tagging system to distinguish between pots deployed by recreational and commercial fishers?

3.3 Catch Recording

Unlicensed fishers would be required to submit periodic catch returns, including details of the species caught, quantities, and fishing effort.

Purpose:

- To begin building a dataset on recreational and part-time fishing activity;
- To inform future stock assessments and conservation measures; and
- To promote responsible fishing practices

The consultation asked

Do you support the requirement for unlicensed fishers to submit catch records?

3.4 Alternative approach

The consultation asked if there were alternative approaches to gathering data on recreational potting that could be considered to enable more complete stock assessments to be conducted?

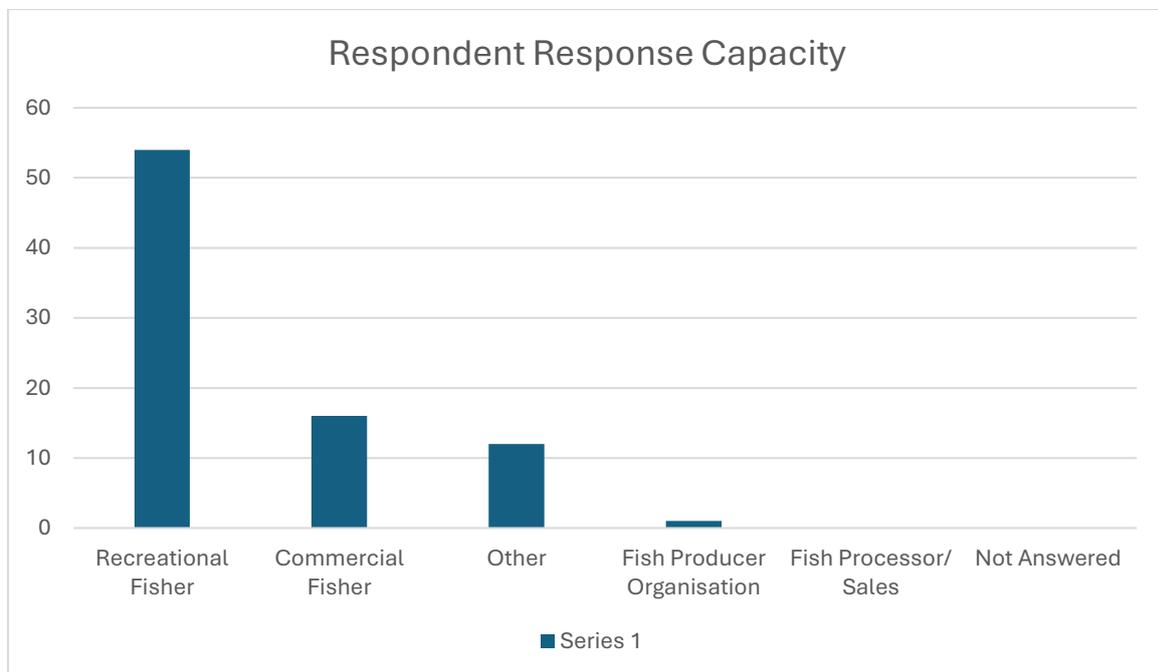
Section 4. Number of respondents

4.1 The Department received 83 responses to this consultation.

4.2 Out of 83 respondents, 7 did not provide either their name or email address.

4.3 Responses were received from 79 individuals with 4 coming from organisations.

4.4 Of the 79 individuals, 54 identified as recreational fishers.



The organisations who responded were as follows:

- Anglo North-Irish Fish Producers' Organisation (ANIFPO)
- Northern Ireland Marine Task Force
- Royal Yachting Association
- The Cruising Association

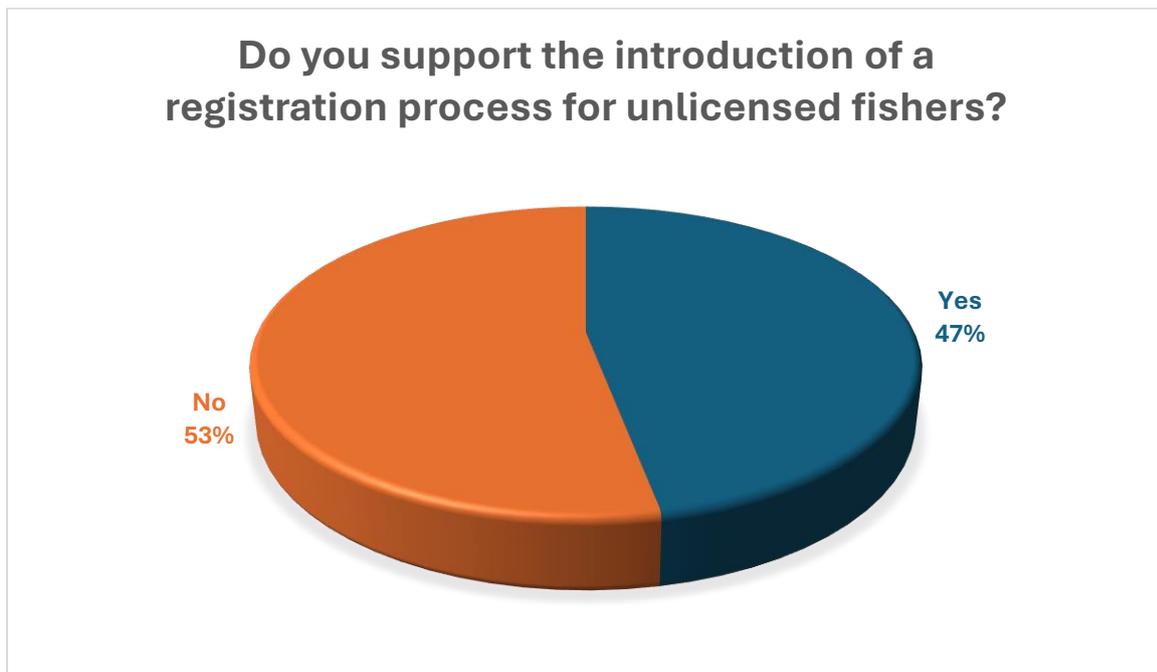
Section 5. Analysis of responses and Way Forward

5.1 Proposal - Registration for recreational potters.

Background

DAERA consulted on whether unlicensed (recreational) fishers without a commercial license should be required to register with DAERA and apply for a permit for recreational pot fishing.

A total of 83 responses were received. 44 responses were in opposition of which 13 failed to provide any additional comments as to why.



Summary of Responses

Opposition to Registration Process: 44 (53.01%)

- **Perceived Over-regulation** – Many respondents described registration as “another government control measure,” expressing frustration over increased bureaucracy rather than focusing on commercial fleet regulation first.

- **Minimal Impact of Recreational Fishing** – Opponents argue that recreational potting is low impact (e.g., “five pots hauled only once/twice per week”), making data collection unnecessary, particularly in comparison to commercial operations.
- **Distrust and Privacy Concerns** – Some fishers are hesitant to share information, fearing future restrictions or complications based on past experiences. There was a level of scepticism about how collected data would be used and whether it would truly benefit resource management.
- **Cost and Practicability** – Comments suggest registration would waste time and money for both fishers and authorities given the small number of recreational fishers in certain areas. Also concerns about the practicality of maintaining a registry.
- **Alternative Suggestions** – Ideas included voluntary online logging for catch and effort or harbour-based data collection during routine visits instead of mandatory registration. These were broadly viewed as more cost effective and less intrusive.
- **Perceived Lack of Justification** – Some comments questioned the need for registration altogether, stating there was no clear evidence that recreational fishing posed a significant threat to marine stocks.

Support for Registration Process: 39 (46.99%)

- **Improved data collection** – Recreational fishers in support of registration see this as a way to gather accurate data on recreational fishing activity, enabling better stock assessment and sustainable management.
- **Accountability and Compliance** – Registration is viewed as a mechanism to ensure fishers adhere to existing rules and help distinguish between licensed and unlicensed fishing activity.

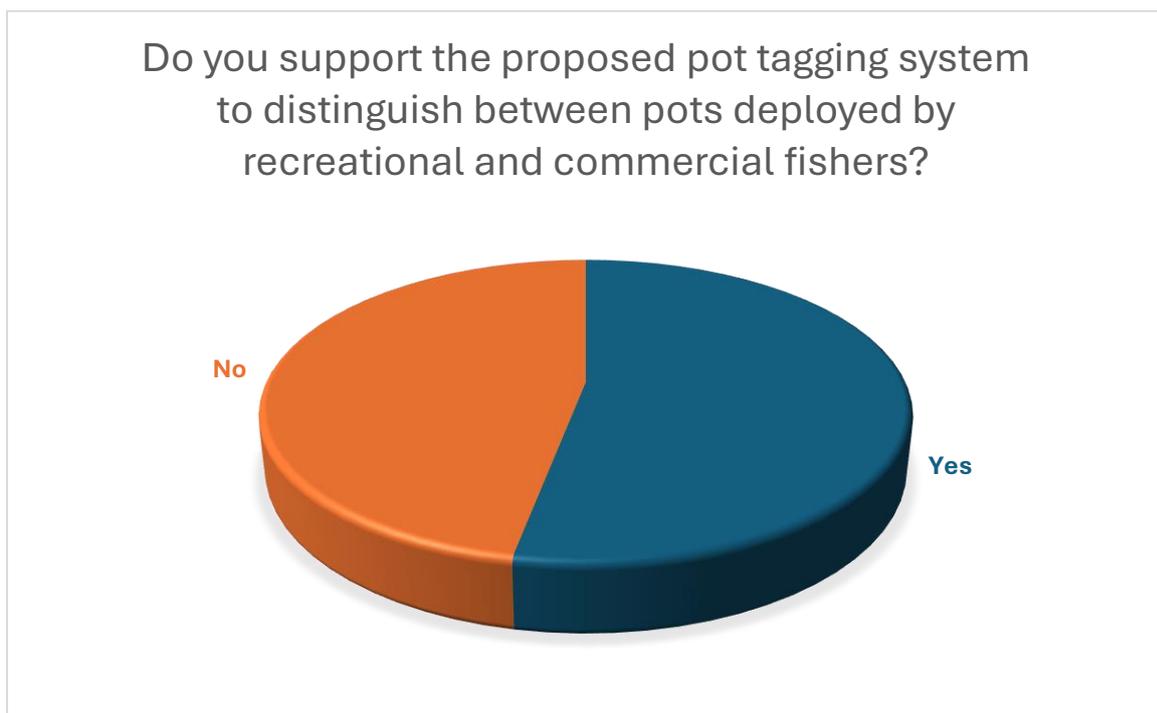
- **Resource Management** – Some respondents believe that registration will help protect marine and maintain fairness between commercial and recreational sectors.

5.2 Proposal - Tagging of Pots

Background

DAERA consulted on a pot tagging requirement to distinguish between pots deployed by recreation and commercial fishers.

A total of **83 responses** were received. 39 responses were in opposition of which 11 of those failed to provide additional comments to support their response.



Summary of Responses

Support for pot tagging (53.01%)

- **Enhances Monitoring, Traceability & Enforcement** - Supporters view pot tagging as essential for identifying gear at sea and

distinguishing legal recreational activity from commercial or unlicensed operations.

- **Supports Evidence-Based Stock Management** - Tagged pots improve data quality on fishing effort, helping close information gaps in the assessment of non-quota shellfish stocks.
- **Fairness across sectors** - Some commercial fishers expressed that tagging ensures all sectors comply and contribute to sustainable management, reducing the potential for unregulated activity under the guise of recreational fishing.
- **Alignment with other measures** - Several respondents supported pot tagging even when opposing other measures (e.g., registration or catch recording), suggesting tagging is perceived as proportionate and practical.

Opposition to pot tagging (46.99%)

- **Recreational Fishing Seen as Low-Impact** - A dominant theme was that recreational potting contributes minimally to fishing pressure, so additional controls like tagging are unnecessary or disproportionate.
- **Administrative Burden** - Some opposed felt pot tagging adds complexity for casual fishers - echoing similar concerns raised in opposition to catch recording requirements.

- **Regulation Should Target Commercial Sector** - Opponents often argued that enforcement should focus on licensed commercial vessels rather than hobbyists using only a few pots.
- **Perceived Lack of Justification / Scepticism About Regulation** - A minority questioned the necessity for tagging given the existing cap of five pots.

Key considerations

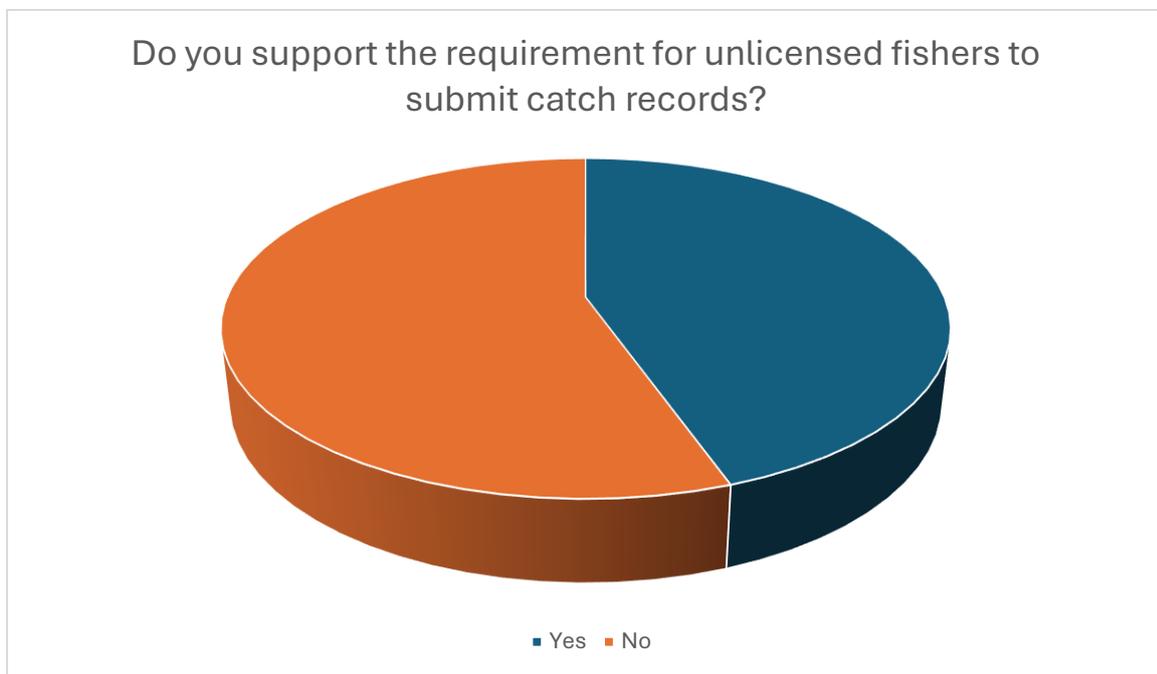
- **Close stakeholder split requires careful justification** - Any introduction of tagging must be accompanied by clear rationale and communications to build acceptance.
- **Balancing sustainability with proportionality** - While tagging brings data and enforcement benefits, the system must remain simple, cost-effective and accessible for recreational users to avoid discouraging compliance.
- **Addressing perceptions of low recreational impact** - Clear communication is needed on why recreational data matters - particularly the contribution to stock assessments and the need to identify unlicensed or disguised commercial activity.
- **Enforcement benefits vs resource requirements** - Tagged pots improve efficiency for enforcement teams by allowing rapid identification of sector and compliance status, but implementation may require additional resources and systems.

5.3 Proposal - Requirement to Submit Catch Records

Background

DAERA consulted on whether unlicensed (recreational) fishers should be required to submit catch records for crab and lobster.

A total of **83 responses** were received. 46 people in total were opposed of which 9 of those failed to provide additional comments to support their response.



Summary of Responses

Support for Catch Recording (44.58%)

- **Improved Stock Management:** Essential for accurate stock assessments and sustainable management.

- **Transparency and Conservation:** Helps enforce size/species restrictions and prevent overfishing.
- **Fairness Across Sectors:** Aligns recreational standards with commercial operators.

Opposition to Catch Recording (55.42%)

- **Low Impact of Recreational Fishing:** Minimal activity compared to commercial operations.
- **Administrative Burden:** Adds complexity for occasional fishers.
- **Focus on Commercial Compliance:** Enforcement should target large-scale operators, not hobbyists.

Key Considerations

- Balancing sustainability with practicality for recreational fishers.
- Potential alternative measures (e.g., voluntary reporting or education campaigns).
- Enforcement priorities for commercial compliance.

5.4 Proposal - Alternative approaches to data collection for recreational potting

Of the 83 consultation responses, 47 (56.63%) answered this question•

Summary of responses

- **Preference for Voluntary Data Submission:** Many respondents favoured voluntary over mandatory data collection, expressing concerns about government control and emphasising that such systems would be less intrusive and more acceptable to recreational fishers.
- **Support for Simple Online Self-Reporting:** There was a recurring suggestion for an easy-to-use website or portal, enabling fishers to log their activities voluntarily. This approach was seen as a less burdensome and more proportionate alternative to formal registration or catch record requirements.
- **Advocacy for In-Person, Harbour-Based Collection:** Some respondents proposed gathering data directly at harbours, arguing that recreational potting is limited and geographically concentrated, making system-wide measures unnecessary.
- **Opposition to Additional Data Collection:** A significant number of comments rejected the need for any new data collection, citing minimal recreational potting effort and negligible stock impacts

compared to commercial fishing. Instead, they suggested focusing regulatory efforts on commercial controls.

- **Call for Proportionate and Targeted Approaches:** There was a consistent theme that any alternative measures should be proportionate to the actual scale and impact of recreational fishing, avoiding broad or costly interventions.

Additional Observations: Few respondents proposed detailed technical solutions, with most feedback being reactive and explaining their disagreement rather than offering structured alternatives. Supportive comments were generally brief and lacked detailed justification.

5.5 Way Forward

It is evident from the analysis of the consultation responses that there is no overwhelming support for the introduction of mandatory registration, pot tagging or submitting catch returns.

Nonetheless, this consultation has proven to be a useful exercise in obtaining the views of individuals who conduct recreational sea fishing for crabs and lobsters, and the Department would welcome continued engagement with the sector.

The Department plans to build on this and carry out further engagement with recreational fishers and ask those to opt-in voluntarily to a pilot

arrangement for pot tagging and submitting catch returns for a few recreational seasons (typically over the summer months).

A pilot arrangement would allow sufficient time to enable the Department to consider the development of a web-based portal for recreational fishers to register and submit catch details.

The Department has a number of individually numbered tags which would be offered to each fisher who opted in. There would be no cost to the fisher for the supply of the five tags.

Whilst an opt-in approach would not in the short-term provide a fully documented impact of the catches by those who fish recreationally for crabs and lobsters, it would enable the Department to evaluate it before considering whether any amendments would be required to the 2008 Regulations for mandatory registration, pot tagging and catch recording for this recreational fishing activity.